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ATTORNEYS AT LAW

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PETER H. FEINBERG
DIRECT DIAL 202-776-2660
pfeinberg@dlalaw.com

WASHINGTON, D.C.

1200 NEW HAMPSHIRE AVENUE, N.W. • SUITE 800 • WASHINGTON, D.C. 20036-6802
TELEPHONE 202-776-2000 • FACSIMILE 202-776-2222

ONE RAVINIA DRIVE • SUITE 1600
ATLANTA, GEORGIA 30346-2108
TELEPHONE 770-901-8800
FACSIMILE 770-901-8874

November 26, 1996

VIA HAND DELIVERY

Mr. William F. Caton
Acting Secretary
Federal Communications Commission
1919 M Street, N.W., Room 222
Washington, D.C. 20554

RECEIVED

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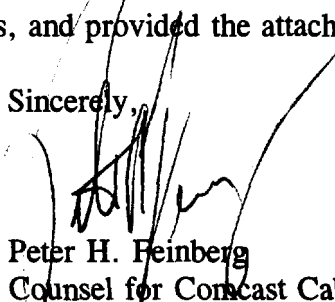
Federal Communications Commission
Office of Secretary

Re: Ex Parte Notice
MM Docket 92-266 (Commercial Leased Access)

Dear Mr. Caton:

In accordance with Section 1.1200 et seq. of the Commission's rules, Comcast Cable Communications, Inc. ("Comcast") files this statement. On November 25, 1996, a representative of Comcast and the undersigned met with James Coltharp of Commissioner Quello's office, Anita Walgreen of Commissioner Ness' Office, and Suzanne Toller of Commissioner Chong's office in connection with the pending reconsideration of the commercial leased access rules in the above-referenced docket. The Company discussed the level of leased access activity in its systems, and provided the attached information.

Sincerely,


Peter H. Feinberg
Counsel for Comcast Cable
Communications, Inc.

PHF/cmf

cc: James Coltharp
Suzanne Toller
Anita Wallgren

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FROM :

Comcast Leased Access

<u>System</u>	<u>average # of hours leased</u>			
	<u>day</u>	<u>week</u>	<u>month</u>	<u>year</u>
Monmouth	18	126	567	6552
West Palm Beach	16	112	504	5824
Mobile	15	105	473	5460
Union	9	63	284	3276
Sarasota	9	63	284	3276
Tuscaloosa	7	49	221	2548
Gloucester	6	42	189	2184
Chesterfield	5	35	158	1820
Little Rock	5	35	158	1820
Baltimore	5	35	158	1820
Indianapolis	4	28	126	1456
Ft. Lauderdale	4	28	126	1456
Tallahassee	3	21	95	1092
Orange County	3	21	95	1092
Burlington	3	21	95	1092
Dover	2	14	63	728
Salisbury	2	14	63	728
Rehoboth	2	14	63	728
Danbury	1	7	32	364
Hattiesburg	0	0	0	0
TOTAL	119	833	3749	43316
Average	6	42	187	2166

FROM :

EXHIBIT A

**COMPARISON OF COMCAST LEASED ACCESS RATES
WITH BROADCAST STATION RATES
FOR HALF-HOUR PROGRAM**

The following chart compares current rates for lease of one-half hour of channel time on selected broadcast stations in various markets served by Comcast cable systems with Comcast's average half-hour rates for leased access derived using current FCC highest net implicit fee formula:

<u>MARKET</u>	<u>STATION</u>	<u>AFFILIATION</u>	<u>½ HOUR RATE (Prime/Non-Prime)</u>	<u>COMCAST SYSTEM RATE FCC Implicit Fee Formula</u>
Richmond, VA	WWBT	NBC	\$10,000/\$2,000	\$28
Charleston, SC	WCBD	ABC	\$1,500/\$150-\$600	\$26
Meridian, MS	WTOK	ABC	\$2,500/\$175-\$225	\$8
West Palm Beach, FL	WTVX	Independent	\$2,500/\$500	\$34
Paducah, KY	KBSI	Fox	\$2,000/\$500	\$12
Fort Wayne, IN	WFFT	Fox	\$1,000/\$550	\$34
Philadelphia, PA	WGTW	Independent	none avail./\$2,000	\$31

FROM :

Exhibit D

Comcast Cable Communications Competitive Media Information

BROADCAST LEASED ACCESS (30 minute program)

Market (System)

Sarasota
Hartford/New Haven (Clinton)
West Palm Beach
Richmond (Chesterfield)
Paducah
Fort Wayne
Chadeston
Meridian
Tuscaloosa

Network Affiliate			Network Independent		
Station	Prime Time	Non-Prime	Station	Prime Time	Non-Prime
WWSB	time not avail	\$1,123	WBSZ	\$750	\$800
WTIC	time not avail	\$500	WTWS	time not avail	\$500
WPBF	\$5,000	\$1,500	WTVX	\$2,000	\$500
WWBT	\$10,000	\$3,000	WLXK	\$400	\$175
WPED	\$2,000	\$350	KBSI	\$2,500	\$500
WPTA	\$3,000	\$1,500	WFFT	\$1,000	\$500
WCBD	time not avail	\$500	WTAT	time not avail	\$350
WTOH	\$2,000	\$300	No Independent station		
WCFT	\$2,000	\$750	WBRC	\$1,000	\$300

OTHER MEDIA

Average ROS		Newspaper
:30 Radio		Classified
		Ad (3 lines)
WSP	\$35	\$30
WBMW	\$15	\$7
WQV	\$85	\$17
WRVQ	\$30	\$12
WKYQ	\$30	\$8
WMEE	\$75	\$5
WTMA	\$35	\$25
WJDQ	\$15	\$15
WFOX	\$25	\$16

AFFILIATE (:30) ADVERTISING RATE

Average	Average
Prime Time	Non-Prime
\$400	\$180
\$150	\$80
\$500	\$250
\$800	\$200
\$250	\$100
\$200	\$75
\$500	\$50
\$325	\$70
\$100	\$35

LOCAL CABLE (:30) ADVERTISING RATE

Average	Average
Prime Time	Non-Prime
\$34	\$21
\$18	\$10
\$50	\$30
\$26	\$14
\$16	\$7
\$50	\$25
\$30	\$15
\$13	\$10
\$30	\$15

CABLE (30 min) LEASED ACCESS

Estimated
F.C.C. MAX
\$31
\$8
\$38
\$22
\$9
\$26
\$30
\$7
\$13

Analysis of :30 commercial

Market (System)

Sarasota
Hartford/New Haven (Clinton)
West Palm Beach
Richmond (Chesterfield)
Paducah
Fort Wayne
Chadeston
Meridian
Tuscaloosa

Affiliate	Cable	Cable rate
Average	Average	as a % of
Prime Time	Prime Time	Affiliate rate
\$400	\$34	8.50%
\$150	\$18	12.00%
\$500	\$50	10.00%
\$800	\$26	3.25%
\$250	\$16	6.40%
\$200	\$50	25.00%
\$500	\$30	6.00%
\$325	\$13	4.00%
\$100	\$30	30.00%

FROM :

**Comcast Cablevision of Lower Merion, Inc.
Competitive Media Information**

BROADCAST TELEVISION

<u>Station</u>	<u>Network Affiliate</u>	<u>30 MINUTE PROGRAM</u>		<u>30 SECOND AD</u>	
		<u>Highest</u>	<u>Lowest</u>	<u>Highest</u>	<u>Lowest</u>
WCAU	CBS	\$18,000*	\$2,000	\$ 4,000*	\$100
WPVI	ABC	No Time Available		\$ 5,500*	\$400
WPHL	Warner	\$ 6,500*	\$1,200	\$ 1,400	\$100
WTXF	FOX	\$10,000*	\$1,000	\$ 2,800*	\$150
WTGI	IND	\$ 900*	\$450	\$ 125*	\$30
WGTW	IND	\$ 2,000*	\$600	\$ 200*	\$20

COMCAST CABLE

	<u>30 MINUTE PROGRAM</u>	<u>30 SECOND AD</u>	
	<u>FCC Formula</u>	<u>Highest</u>	<u>Lowest</u>
	\$5.60	\$100	\$6

RADIO

<u>Top 10 Station (Average Rates)</u>	<u>60 SECOND AD</u>	
	<u>Highest</u>	<u>Lowest</u>
	\$400	\$60

NEWSPAPER

<i>Main Line Times</i>	
One Time Classified Ad (3 Lines)	\$16.20

* Does Not Include Prime Time

Source for Broadcast TV and Radio Rates: Harmelin & Associates, Inc.